

Matthew S. Tamasco (MT 9193)
SCHNADER HARRISON SEGAL & LEWIS LLP
140 Broadway, Suite 3100
New York, NY 10005-1101

-and-

Nicholas J. LePore, III (PA Bar I.D. 32196)
SCHNADER HARRISON SEGAL & LEWIS LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103-7286

Attorneys for PJM Interconnection, LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC.,	:	Case No. 08-13555(JMP
<i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors.	:	
-----	X	

**NOTICE OF ENTRY OF APPEARANCE OF
NICHOLAS J. LePORE, III AND MATTHEW S. TAMASCO
ON BEHALF OF PJM INTERCONNECTION, LLC,
COMBINED WITH DEMAND FOR SERVICE OF PAPERS**

Please take notice that PJM Interconnection, LLC, a creditor and party-in-interest in the above-captioned bankruptcy case (“Creditor”), hereby appears in the above-captioned bankruptcy case by its counsel, Nicholas J. LePore, III and Matthew S. Tamasco; and as such counsel hereby enter their appearances pursuant to Fed. R. Bankr. P. 9010(b); and such counsel hereby request, pursuant to Fed. R. Bankr. P. 2002, 9007, 9010, 9013, 9014, and Section 342 of Title 11 of the United States Code, 11 U.S.C. §101, et seq. (the “Bankruptcy Code”), that copies of all notices and pleadings given or filed in this case be given and served upon the undersigned at the following address:

Nicholas J. LePore, III, Esquire
Schnader Harrison Segal & Lewis LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103-7286
nlepore@schnader.com

Please take further notice that the foregoing demand includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced case and all proceedings therein.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of the Creditor's rights (1) to have final orders in noncore matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, setoffs, or recoupments to

which the Creditor is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments the Creditor expressly reserves.

Dated: June 19, 2009

/s/ Matthew S. Tamasco
Matthew S. Tamasco (MT 9193)
mtamasco@schnader.com
SCHNADER HARRISON SEGAL & LEWIS LLP
140 Broadway, Suite 3100
New York, NY 10005-1101
(212) 973-8000 (voice)
(212) 972-8798 (facsimile)

and

Nicholas J. LePore, III (PA: Bar ID No. 32196)
nlepore@schnader.com
SCHNADER HARRISON SEGAL & LEWIS LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103-7286
(215) 751-2000 (voice)
(215) 751-2205 (facsimile)